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20 UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA

22 MICHAEL WALKER, TASHELL  
23 MITCHEL,

24 Plaintiffs,

25 v.

26 UNITRIN AUTO AND HOME INSURANCE  
27 COMPANY, FINANCIAL INDEMNITY  
28 COMPANY, UNITRIN DIRECT  
PROPERTY AND CASUALTY COMPANY  
and DOES 1 TO 25, inclusive,

Defendants.

Case No. 3:14-cv-03161--EMC

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO CONTINUE  
DEADLINE TO FILE DISCOVERY  
MOTIONS**

**[CIVIL L.R. 6-1(b); 6-2; 7-12]**

Plaintiff Michael Walker and defendant Financial Indemnity Company ("FIC"), through their respective undersigned counsel and pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, hereby respectfully submit the following Joint Stipulation and [Proposed] Order to Continue the Deadline to File Expert Discovery Motions.

### STIPULATION

WHEREAS, the Court issued a Scheduling Order on July 31, 2015 setting trial and pre-trial deadlines, including a deadline to complete non-expert discovery by October 8, 2015 (ECF No. 65);

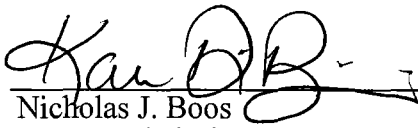
WHEREAS, pursuant to Civil L.R. 37-3, the deadline to file motions to compel fact discovery is October 15, 2015;

WHEREAS, the parties are currently still attempting to meet and confer to resolve outstanding issues regarding fact discovery and request additional time to continue these efforts before filing a joint letter brief with the Court regarding these issues;

WHEREAS, the parties hereby stipulate and respectfully request that the Court continue the deadline to file a joint letter brief regarding fact discovery until October 22, 2015.

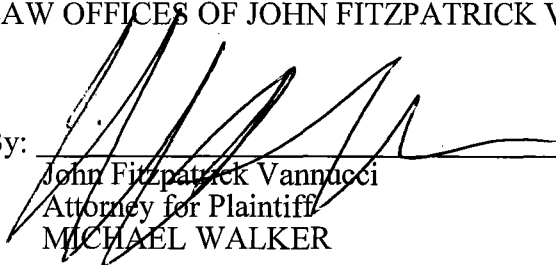
DATED: October 15, 2015

SEDGWICK LLP

By:   
 Nicholas J. Boos  
 Kara L. DiBiasio  
 Attorneys for Defendant  
 FINANCIAL INDEMNITY COMPANY

DATED: October 15, 2015

LAW OFFICES OF JOHN FITZPATRICK VANNUCCI

By:   
 John Fitzpatrick Vannucci  
 Attorney for Plaintiff  
 MICHAEL WALKER

*Attestation Regarding Signatures: Pursuant to Civil Local Rule 5-1(i)(3), Kara L. DiBiasio hereby attests that concurrence in the filing of the document has been obtained from each of the other signatories identified above, which shall serve in lieu of their signatures on the document.*

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, it is hereby ORDERED that the deadline for the parties to file joint letter briefs regarding non-expert discovery shall be continued until October 22, 2015.

IT IS SO ORDERED.

DATED: 10/19/15

